

BATHAE DUNNE LLP
Yavar Bathaee (CA 282388)
yavar@bathaeedunne.com
Andrew C. Wolinsky (CA 45965)
awolinsky@bathaeedunne.com
445 Park Avenue, 9th Floor
New York, NY 10022
Tel.: (332) 322-8835

Brian J. Dunne (CA 275689)
bdunne@bathaeedunne.com
Edward M. Grauman (*pro hac vice*)
egrauman@bathaeedunne.com
901 South MoPac Expressway
Barton Oaks Plaza I, Suite 300
Austin, TX 78746
Tel.: (213) 462-2772

*Interim Co-Lead Counsel for the
Advertiser Classes*

SCOTT+SCOTT ATTORNEYS AT LAW LLP
Amanda F. Lawrence (*pro hac vice*)
alawrence@scott-scott.com
Patrick J. McGahan (*pro hac vice*)
pmcgahan@scott-scott.com
Michael P. Srodoski (*pro hac vice*)
msrodoski@scott-scott.com
156 South Main Street, P.O. Box 192
Colchester, CT 06415
Tel.: (860) 537-5537

Patrick J. Coughlin (CA 111070)
pcoughlin@scott-scott.com
Carmen A. Medici (CA 248417)
cmedici@scott-scott.com
Hal D. Cunningham (CA 243048)
hcunningham@scott-scott.com
Daniel J. Brockwell (CA 335983)
dbrockwell@scott-scott.com
600 W. Broadway, Suite 3300
San Diego, CA 92101
Tel.: (619) 233-4565

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

MAXIMILIAN KLEIN, et al., on behalf of
themselves and all others similarly situated,

Plaintiffs,

v.

META PLATFORMS, INC.,

Defendant.

Consolidated Case No. 3:20-cv-08570-JD

**DECLARATION OF AMANDA F.
LAWRENCE IN SUPPORT OF
ADVERTISER PLAINTIFFS'
OPPOSITION TO MOTION TO
EXCLUDE TESTIMONY OF SCOTT
FASSER**

Hearing Date: December 14, 2023
Hearing Time: 10:00 a.m.
Courtroom: 11, 19th Floor
Judge: The Honorable James Donato

1 I, Amanda F. Lawrence, declare as follows:

2 1. I am an attorney admitted pro hac vice in this action (the “Action”). I am a partner at
3 Scott+Scott Attorneys at Law LLP, interim Co-Lead Counsel for the Advertiser Classes in the Action.
4 I submit this declaration in support of Advertiser Plaintiffs’ Opposition to Motion to Exclude
5 Testimony of Scott Fasser. The contents of this declaration are based on my personal knowledge,
6 including my personal knowledge of the documents cited herein. The facts set forth herein are within
7 my personal knowledge and if called as a witness, I could and would competently testify to them.

8 2. Attached hereto as **Exhibit 1** is a true and correct copy of the Expert Report of Scott
9 Fasser, dated July 7, 2023.

10 3. Attached hereto as **Exhibit 2** is a true and correct copy of the Reply Expert Report of
11 Scott Fasser, dated September 1, 2023.

12 4. Attached hereto as **Exhibit 3** is a true and correct copy of a document produced by
13 Meta in this litigation bearing the Bates-stamp PALM-005500133.

14 5. Attached hereto as **Exhibit 4** is a true and correct copy of excerpts from the Deposition
15 of Scott Fasser, dated September 7, 2023.

16 6. Attached hereto as **Exhibit 5** is a true and correct copy of a document produced by
17 Meta in this litigation bearing the Bates-stamp PALM-003307673.

18 7. Attached hereto as **Exhibit 6** is a true and correct copy of a document produced by
19 Meta in this litigation bearing the Bates-stamp PALM-005856043.

20 8. Attached hereto as **Exhibit 7** is a true and correct copy of a document produced by
21 Meta in this litigation bearing the Bates-stamp PALM-003564210.

22 9. Attached hereto as **Exhibit 8** is a true and correct copy of a document produced by
23 Meta in this litigation bearing the Bates-stamp PALM-008608439.

24 10. I declare under penalty of perjury under the laws of the United States of
25 America that the foregoing is true and correct. Executed on this 13th day of October, 2023 at
26 Colchester, Connecticut.

27 /s/Amanda F. Lawrence
Amanda F. Lawrence

CERTIFICATE OF SERVICE

I hereby certify that on October 13, 2023, I caused a true and correct copy of the foregoing document to be served by electronic mail on all counsel of record.

Dated: October 13, 2023

By: /s/Amanda F. Lawrence
Amanda F. Lawrence